APPENDIX K – PRELIMINARY ENVIRONMENTAL ASSESSMENT TECHNICAL MEMORANDUM SAMPLE

Preliminary Environmental Assessment
Technical Memorandum

[Site Designation]
[Site Address or Major Cross Streets]
[City], California [Zip Code]
[Site Code]

Prepared for:
[School District]
[District Office Address]
[City], California [Zip Code]

Prepared by:
[Consultant Company]
[Office Address]
[City], California [Zip Code]

[Date of Report]

EXECUTIVE SUMMARY

The executive summary should summarize the main information presented in the Preliminary Environmental Assessment Technical Memorandum. It should include, but not be limited to, the following information:

- Purpose of the Preliminary Environmental Assessment Technical Memorandum
  - Identification of areas of concern being addressed based on recognized environmental concerns identified in the Phase I report or after review of information consistent with a Phase I.
- School district
- Site designation consistent with information submitted to the California Department of Education
- Site location
  - Street address or nearest cross streets
  - City and county
- Site description
  - Size of the site (preferably in acres)
  - Current and historical business activity conducted on site
- Type of school site – proposed, expansion, or existing
- Type of school proposed – grade levels of students
- Number of classrooms and students
- Intended use of the site – whether all or a portion of the site will be used

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ABBREVIATIONS AND ACRONYMS

Abbreviation or acronym | Description

1.0 INTRODUCTION

The introduction should introduce the site, present the organization of the report, and include the following information:

- School district
- Site designation consistent with information submitted to the California Department of Education
- Site location
    - Street address or nearest cross streets
    - City and county
- Type of school site – proposed, expansion, or existing
- Type of school proposed – grade levels of students
- Number of classrooms and students
- Intended use of the site – whether all or a portion of the site will be used
- Proposed disposition of existing structures
- Proposed source of potable and non-potable water supply

The introduction should also identify recognized environmental conditions that lead to the recommendation for further investigation and the reason for preparing a Preliminary Environmental Assessment (PEA) Technical Memorandum which may include:

- A Phase I report was submitted for DTSC review and approval and DTSC provided a determination that a PEA is required to determine one or more of the following (Ed. Code, § 17213.1, subd. (a)):
    - If a release of hazardous material has occurred and, if so, the extent of the release.
    - If there is the threat of a release of hazardous materials.
    - If a naturally occurring hazardous material is present.

  Provide the date of the determination letter and include a copy of the letter in Appendix A.
- Based on review of information consistent with a Phase I there is the potential for a release of hazardous materials or presence of naturally occurring hazardous materials. As a result, the school district has elected to proceed directly to a PEA (Ed. Code, § 17213.1, subd. (a)).
- A PEA Technical Memorandum is being submitted in lieu of a formal PEA Workplan based on consultation with DTSC. All of the areas of concern (based on the RECs identified in the Phase I or after review of information consistent with a Phase I) identified at the site are addressed by DTSC guidance with sample and analytical protocols, such as agricultural properties with potential

OCPs and metals, sites with potential lead-based paint, termiticide application or electrical transformers, or sites with potential NOA.

This section should briefly address the PEA scoping meeting, participants, and discussion.

1.1 PURPOSE

This section should state the purpose of the PEA Technical Memorandum, part of the second step of the environmental review process for school sites, with respect to recognized environmental conditions identified for the site. Specifically for school sites, the objective of the PEA is to determine whether current or past hazardous material management practices or waste management practices have resulted in a release or threatened release of hazardous materials, or whether naturally occurring hazardous materials are present, which pose a threat to children's health, children's learning abilities, public health or the environment (Ed. Code, § 17210, subd. (h)).

This section may also include other objectives or reasons as requested by the school district.

1.2 SCOPE OF WORK

The scope of work should provide a detailed scope of services conducted for the PEA, including assumptions, limitations and exceptions, special terms and conditions, and user reliance.

This section should list the DTSC requirements or guidance complied with to meet the objectives of the PEA Technical Memorandum, for example:

- California Code of Regulations
  - Sampling for lead in soil from lead-based paint: California Code of Regulations, title 22, section 69105.
  - Sampling for OCPs in soil from termiticide application: California Code of Regulations, title 22, section 69106.
  - Sampling for PCBs in soil from electrical transformers: California Code of Regulations, title 22, section 69107.
- DTSC Guidance (the most recent version of the document from the DTSC School Site Evaluation web page at www.dtsc.ca.gov/Schools/index.cfm should be used)
  - *Interim Guidance for Sampling Agricultural Properties (Third Revision)* (DTSC 2008)
  - *Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers* (Lead, OCPs, and PCBs Guidance) (DTSC 2006a).
  - *Interim Guidance for Naturally Occurring Asbestos (NOA) at School Sites* (DTSC 2004).

2.0 SITE DESCRIPTION

The site description should describe the physical setting of the site in relation to the surrounding area and include the following information:

- School site designation consistent with information submitted to CDE.
- Other site designations used historically.
- United States Environmental Protection Agency (U.S. EPA) identification number, if assigned.
- DTSC EnviroStor database number, if assigned.
- Street address or nearest cross streets, city or nearest community, county, state, zip code
- School district
- Size of the site (preferably in acres)
- Assessor's parcel number
- Township, range, section, and principal meridian
- Geographic coordinates (longitude and latitude)
- State Senate and Assembly districts
- Site and vicinity general characteristics: Climatic, topographic, geologic, hydrogeologic, and hydrologic.
- Current and historical uses of or operations on the site.
- Descriptions of improvements on the site.
- Current and historical uses of or operations on adjacent properties.

2.1 SITE HISTORY

The site history should be a summary based on the findings of the Phase I, including user provided information, records review, site inspections, and interviews. This should include business type, years of operation, prior land use, facility ownership/operators, property owners and surrounding land uses.

2.2 PREVIOUS ASSESSMENTS

This section of the report should include summaries of prior assessments or investigations, such as a Phase I report or other historical investigations. The documents should be adequately referenced to facilitate retrieval by another party. At a minimum, the summaries for prior assessments or investigations should include the following information:

- Site designation

- Street address or nearest cross streets, city or nearest community, county, state, zip code
- Size of the site (preferably in acres)
- Assessor's parcel number
- Township, range, section, and principal meridian
- Geographic coordinates (longitude and latitude)
- Purpose of the assessment or investigation
- Findings
- Conclusions and recommendations
- Review and approval by a regulatory agency

The area addressed in previous assessments should be correlated to the area of proposed school site to clearly demonstrate the spatial extent of each assessment and how it relates to the proposed school site. In some cases, a figure showing the spatial extent of each assessment or investigation may be useful.

3.0 RECOGNIZED ENVIRONMENTAL CONDITIONS

This section should present the recognized environmental conditions (RECs) identified in the Phase I (or after review of information consistent with a Phase I) to be addressed. A PEA Technical Memorandum may be submitted in lieu of a formal PEA Workplan based on consultation with DTSC when all of the areas of concern at the site are limited to those with DTSC guidance with sample and analytical protocols, such as agricultural properties with potential OCPs and metals, sites with potential lead-based paint, termiticide application or electrical transformers, or sites with potential NOA.

3.1 CHEMICALS OF POTENTIAL CONCERN

This section should identify chemicals of potential concern associated with the RECs. Chemicals of potential concern should be consistent with applicable DTSC guidance.

4.0 FIELD SAMPLING PLAN

A PEA Technical Memorandum may be submitted in lieu of a formal PEA Workplan based on consultation with DTSC when all of the areas of concern at the site are limited to those with DTSC guidance with sample and analytical protocols. The DTSC guidance followed for this investigation should be referenced. The field sampling plan should be consistent with the applicable DTSC guidance and any deviations from the guidance should be identified.

The field sampling plan should include the information identified in the headings of the following subsections. Depending upon the complexity of the site, the field sampling plan may be condensed, but should provide sufficient information to facilitate reconstruction by another environmental assessor.

4.1 SAMPLING OBJECTIVES

This section should include the objectives of sampling consistent with the regulations or guidance followed.

4.2 SAMPLING APPROACH

This section should describe the regulations or guidance followed and sampling strategy to be used.

4.3 SAMPLING LOCATIONS AND RATIONALE

This section should present the sampling locations and rationale. Sampling locations should be presented on a site plan as Figure 4. The site plan should be of sufficient detail to clearly show sampling locations relative to the associated recognized environmental condition. Sampling locations, depths, designation, rationale, and analyses should be identified in Table 1.

4.4 SAMPLE COLLECTION

This section of the report should describe the step-by-step procedures of how each sample was collected. The procedures should be the step-by-step instructions used by field personnel to collect the samples and should be sufficiently detailed to allow re-creation by another environmental assessor. The description should demonstrate that the data gathered will meet the sampling objectives.

4.4.1 Sampling Equipment and Procedures

This section should describe all equipment used to obtain samples.

4.4.1.1 DECONTAMINATION

Removing or neutralizing contaminants from equipment minimizes the likelihood of sample cross-contamination, reduces or eliminates transfer of contaminants to clean areas, and prevents the mixing of incompatible substances.

A decontamination plan should be developed for the investigation and be included in the FSP. Decontamination stations should be set up before any personnel or equipment enters the areas of potential exposure. The decontamination plan should include the following:

- The number, location, and layout of the decontamination stations.
- Decontamination equipment needed.
- Appropriate decontamination methods.

It is recommended to use plastic sheeting on the ground for the decontamination station. This will protect the area from overspray or contaminated dirt from the dirty equipment.

The use of distilled/deionized water commonly available from commercial vendors may be acceptable for decontamination of sampling equipment. The use of an untreated potable water supply is not an acceptable substitute for tap water. Tap water may be used from any municipal or industrial water treatment system. Since tap water is known to contain trihalomethanes and low level metals, the final equipment rinse should be with distilled or deionized water. If acids or solvents are utilized in decontamination, they raise health and safety and waste disposal concerns and should be managed appropriately.

4.4.1.2 PREPARATION

A description of the methods used to homogenize, split, and composite samples should be provided.

4.4.2 Containers and Preservation

This section should describe the sample containers and type of pre-cleaning method to be used. This section should also identify the preservatives used for the different analyses.

4.4.3 Packaging and Shipment

This section should describe the methods for packaging, labeling, marking and shipping the samples.

4.4.4 Documentation

A description of label with an example should be provided. A unique number system that positively identifies each sample and does not distinguish the quality control (QC) samples from other samples should be described.

There should be a discussion of field documentation to include field logs, photographs, and QC checklist or logs, and chain-of-custody forms. The specific types of entries to be made in the various logs should be stated.

4.5 SAMPLE ANALYSES

This section should identify the field and laboratory analyses to be performed on each sample or group of samples. Analyses for each sample should be added to Table 1. The description of analyses should include preparation and analytical methods, analytes, quantitation limits, holding times, and preservation. Quantitation limits should be less than the screening value used for comparison.

4.5.1 Field

This section should discuss field analyses, such as x-ray fluorescence (XRF), including the preparation and analytical method, analytes, quantitation limits, holding times, and preservation.

4.5.2 Laboratory

This section should discuss laboratory analyses, including the preparation and analytical method, analytes, quantitation limits, holding times, and preservation.

4.6 INVESTIGATION DERIVED WASTE

This section of the report should describe the management and disposition of wastes generated during the investigation, including soil cuttings, personal protective equipment, decontamination water, etc. Management and disposition of wastes should be consistent with the U.S. EPA Guide to Management of Investigation-Derived Wastes (U.S. EPA 1992).

5.0 QUALITY ASSURANCE/QUALITY CONTROL

Revise to be consistent with "Data Validation Memorandum, Summary of the Level II Data Validation for Advanced Technology Report ATV5796, dated April 25, 2006," dated May 2, 2006. QA/QC should also be consistent with guidance document being followed.

The overall quality assurance and quality control (QA/QC) should ensure that sampling, field and laboratory chain-of custody, laboratory analyses, field and laboratory data measurements, and reporting activities provide data quality consistent with the intended use. As part of the project QA/QC evaluation, data validation should be performed for all submitted samples. Data quality should be defined by data quality indicators (accuracy, precision, method reporting limits, completeness, representativeness, and comparability). A summary of data validation should be included in the Phase I Addendum report.

5.1 FIELD QUALITY CONTROL SAMPLE EVALUATION AND FIELD VARIANCE

This section of the report should discuss collection of quality control samples to support sampling activities. This include field quality control samples, laboratory quality control samples, confirmation samples by a fixed laboratory (if x-ray fluorescence is used for lead sampling and analysis), or split samples (if collected). Field quality control samples include blanks and duplicates. Collection of background samples is not required because initial screening values specified below will be utilitzed for data interpretation and screening risk evaluation.

Only one blank sample per matrix per day should be collected. If equipment rinsate blanks are collected (if reuseable, non-disposable sampling equipment was used for the sampling event), field/container blanks and trip blanks are not required under normal circumstances. At least 10 percent of samples collected per event should be field duplicates for each group of analytes.

A state certified laboratory performing the analysis should have its own internal QA/QC procedures. They include method blanks, surrogates, matrix spike and matrix spike duplicates, laboratory duplicates and initial and continuing calibration checks. The procedures will more than likely vary between laboratories.

5.1.1 Collocated Sample and/or Field Replicates

Ten (10) % of the total number of samples should be collected as collocated duplicates (duplicate samples collected at same location) or as split samples (one sample split into two for analysis). These measures serve as checks on the accuracy and precision of the sample collection method.

5.1.2 Equipment Blanks

One equipment blank should be collected during each sampling day that non-dedicated equipment is used to collect samples. The equipment blank should accompany the sample shipment and should be analyzed by the laboratory with the samples using the same methods. The equipment blank serves to check for potential cross contamination of samples collected with the same equipment

5.1.3 Field Blanks

One field blank sample should be collected by exposing a clean, empty sample container to the atmosphere in the same manner as samples are exposed during collection. This serves as a check on contamination in the atmosphere at the site and to verify that none of the analytes of interest measured in the field samples resulted from contamination of the samples during sampling.

5.1.4 Temperature Blanks

One temperature blank should accompany all sample shipments. The temperature blank consists of a container filled with water placed inside the sample storage container. By checking the temperature blank, the laboratory is able to note the sample storage temperature.

5.2 LABORATORY QUALITY ASSURANCE

The PEA report should detail the QA measures implemented by the laboratory during sample analysis. All State-certified laboratories have their own internal QA measures. All data validation should be consistent with "Data Validation Memorandum, Summary of the Level II Data Validation for Advanced Technology Report ATV5796, dated April 25, 2006," dated May 2, 2006. The minimum QA measures to be implemented by the laboratory are described in Appendix E – PEA Workplan.

6.0 HEALTH AND SAFETY

This section of the report should describe the Health and Safety Plan (HASP) to be followed for the activities described herein. If x-ray fluorescence will be used for lead sampling and analysis, qualification of the operator, standard operating procedures notes and compliance with radioactive safety requirements should be discussed in this section.

The Health and Safety Plan (HASP) should be included as Appendix C. DTSC is not charged with the enforcement of occupational health standards and is not limited by such standards requiring health and safety information. DTSC review is based upon authority provided by the Health and Safety Code, title 22, and the Code of Federal Regulations. See Appendix C for summary of relevant regulatory citations and DTSC policies and procedures that give DTSC the authority to require a HASP be developed, submitted, reviewed and corrected to DTSC standards. The HASP should generally follow *Draft Site Specific Health and Safety Plan Guidance Document For Site Assessment/Investigation, Site Mitigation Projects, Hazardous Waste Site Work Closure, Post Closure, and Operation and Maintenance Activities* (DTSC 2000). The most recent version of this guidance document should be used and is available on the DTSC web page at www.dtsc.ca.gov [Only include if the HASP Template is posted on the DTSC Web site accessible by the public. The template is currently only available on the DTSC Intranet. Check with Kathleen Yokota-Wahl for status of posting to public web site]. The site-specific HASP, at a minimum, should include the following information:

- Facility background.
- Key personnel, including Site Safety Officer, and responsibilities.
- Safety and health risk or hazard analysis for each site task and operation found in the workplan.
- Employee training assignments (Cal. Code Regs., tit. 8, sec. 5192, subd. (e) (Training)).
- Personal protective equipment (PPE) to be used by employees for each of the site tasks and operations being conducted as required by the PPE program (Cal. Code Regs., tit. 8, sec. 5192, subd. (g)).
- Medical surveillance requirements (Cal. Code Regs., tit. 8, sec. 5192, subd. (f) (Medical Surveillance)).
- Frequency and types of air monitoring, personnel monitoring, and environmental sampling techniques and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used.
- Site control measures (Cal. Code Regs., tit. 8, sec. 5192, subd. (d) (Site Control)).

- Decontamination procedures (Cal. Code Regs., tit. 8, sec. 5192, subd. (k) (Decontamination)).
- An emergency response plan for same and effective responses to emergencies, including the necessary PPE and other equipment (Cal. Code Regs., tit. 8, sec. 5192, subd. (k) (Decontamination)).
- Confined space entry procedures (Cal. Code Regs., art. 108, Confined Spaces).
- Spill containment program (Cal. Code Regs., tit. 8, sec. 5192, subd. (j) (Handling Drums and Containers)).
- Procedures for providing potable water and sanitary facilities to site personnel (Cal. Code Regs., tit. 8, sec. 5192, subd. (n) (Sanitation at Temporary Workplaces)).
- Safe drum and container handling procedures (Cal. Code Regs., tit. 8, sec. 5192, subd. (j) (Handling Drums and Containers)).
- Procedures to verify that adequate illumination is afforded site personnel (Cal. Code Regs., tit. 8, sec. 5192, subd. (n)).]

Procedures should be included to identify and minimize potential off-site or community impacts from the activities described herein.

7.0 PUBLIC PARTICIPATION

This section should discuss plans for preparing, distributing and posting the notice for field work. Education Code, section 17210.10, subdivision (b) requires that school districts provide a notice to residents in the immediate area prior to commencement of field work associated with a PEA. School districts are to follow DTSC's format when creating work notices and should ensure that the language include is made site-specific. The work notice should be distributed on the district's letterhead and should include both district and DTSC contact information.

DTSC recommends the work notice be mailed or hand-delivered, at least three days prior to field activities, to all residences and businesses within view of the site, so that it is received at least three to five days prior to the commencement of field work.

The district should provide the DTSC Project Manager with a copy of the site specific work notice and a copy of the distribution address list as proof of service.

8.0 ADDITIONAL REGULTORY REQUIREMENTS

This section should identify and discuss additional regulatory requirements applicable to the activities described herein, such as:

- Local fire department requirements
- Local building department requirements
- Regional or Local boring permits
- Other federal, state, or local requirements
- Contacting the appropriate regional notification center (e.g. Underground Service Alert, DigAlert, 1-800-227-2600, 811) prior to conducting any excavation (including grading, trenching, digging, ditching, drilling, auguring, tunneling, scraping, cable or pipe plowing, and driving) pursuant to Government Code sections 4216 through 4216.9.

9.0 PROJECT SCHEDULE

In order that all parties understand the objectives, tasks, and milestones of the project, a conceptual schedule should be discussed during the PEA scoping meeting. The schedule should consider school district needs and DTSC review timeframes. This section should include a schedule based on discussions during the PEA scoping meeting. At a minimum, the schedule should include tasks from submittal of the PEA Technical Memorandum through DTSC approval of the PEA Report. Schedules should be updated periodically in consultation with DTSC and may be modified based on site specific issues.

10.0 REFERENCES

The report shall include a references section to identify published referenced sources relied upon in preparing the PEA Technical Memorandum. Each referenced source shall be adequately annotated to facilitate retrieval by another party.

American Society of Testing and Materials (ASTM). 2005. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.* Designation E 1527. Approved on November 1, 2005.

Department of Toxic Substances Control (DTSC). 2008. *Interim Guidance for Sampling Agricultural Properties (Third Revision).* April 30, 2008.

DTSC. 2006a. *Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers.* Revised June 9, 2006, non-substantive revisions made September 12, 2006.

DTSC. 2006b. Data Validation Memorandum, Summary of the Level II Data Validation for Advanced Technology Report ATV5796, dated April 25, 2006." May 2, 2006.

DTSC. 2000. *Draft Site Specific Health and Safety Plan Guidance Document for Site Assessment/Investigation, Site Mitigation Projects, Hazardous Waste Site Work Closure, Post Closure, and Operation and Maintenance Activities.* December 2000.

United States Environmental Protection Agency (U.S. EPA). 1992. *Guide to Management of Investigation-Derived Wastes, Quick Reference Fact Sheet.* Office of Solid Waste and Emergency Response. Publication 9345.3-03FS. January 1992.

11.0 SIGNATURE AND QUALIFICATIONS OF ENVIRONMENTAL ASSESSOR

The environmental assessor responsible for the PEA shall sign the document and include the following information as proof of qualifications:

- Class II Registered Environmental Assessor (REA): REA Number, signature, and expiration date.
- Professional Engineer registered in the State of California (civil (including geotechnical and structural), electrical, and mechanical): License number, signature, seal or stamp, and expiration date (Bus. & Prof. Code, §§ 6735, 6735.3, and 6735.4).
- Professional Engineer registered in the State of California (agricultural, chemical, control system, corrosion, fire protection, industrial, manufacturing, metallurgical, nuclear, petroleum, or traffic): License number, signature, and optional seal or stamp.
- Professional Geologist registered in the State of California: License number, signature, seal or stamp, and expiration date (Bus. & Prof. Code, § 7835).
- Certified Engineering Geologist registered in the State of California: License Number signature, seal or stamp, and expiration date (Bus. & Prof. Code, § 7835).
- Licensed Hazardous Substance Contractor: Contractor's license number, HAZ (Hazardous Substance Removal) certification, signature, and expiration date.

In addition to the qualifications identified above, an environmental assessor must also possess at least at least three years of experience in conducting PEAs (Ed. Code, § 17210, subd. (b)). As proof of qualifications, the number of years of relevant experience for the environmental assessor should be identified in this section.

Similar to ASTM Practice E 1527 (ASTM 2005) for Phase Is, this document should include the following statement of the environmental assessor(s) responsible for preparing the PEA Technical Memorandum:

"[I, We] declare that, to the best of [my, our] professional knowledge and belief, [I, we] meet the definition of environmental assessor as defined in and have the experience required by Education Code, section 17210, subsection (b)."

In addition to qualifications and experience required to work on school sites, requirements exist for specific work that may be conducted during environmental assessments, investigations, or cleanup of school sites:

- All engineering work shall be conducted in compliance with the Professional Engineers Act (Bus. & Prof. Code, § 6700 et seq.) and Rules of the Board for Professional Engineers and Land Surveyors (Cal. Code Regs., tit. 16, § 400 et seq.).
- All geologic work shall be conducted in compliance with the Geologist and Geophysicist Act (Bus. & Prof. Code, § 7800 et seq.) and Rules of the Board for Geologists and Geophysicists (Cal. Code Regs., tit. 16, § 3000 et seq.).
- Contractors engaging in removal or remedial actions must be a licensed hazardous substance contractor with the Contractors' State License Board (Bus. & Prof. Code § 7058.7).

FIGURE 1 SITE LOCATION MAP

This map should include a north area, be to scale, and show the general location of the site relative to its surrounding area, including major highways, surface water bodies, land use, sensitive populations, and critical habitats.

FIGURE 2 SITE VICINITY MAP

This map should include a north arrow, be to scale, and be of sufficient detail to show adjacent property uses.

FIGURE 3 SITE PLAN

This plan should include a north arrow, and be to scale, and be of sufficient detail to show significant site features, including site boundaries, land use, paved areas, structures, drainage patterns, areas of known or suspected environmental conditions, and recognized environmental conditions.

FIGURE 4 SAMPLING LOCATIONS

This figure should show the sampling locations overlaid onto the site plan. The figure should clearly show the sampling locations relative to the areas of recognized environmental conditions. The sample locations, depths, and matrix should be clearly presented.

FIGURE 5 PROJECT SCHEDULE

This figure should include the project schedule. At a minimum, the schedule should include tasks from submittal of the PEA Technical Memorandum through DTSC approval of the PEA Report.

TABLE 1 SUMMARY OF SAMPLING LOCATIONS AND RATIONALE

This table should identify the sampling locations, depths, designation, and rationale, and associated analyses. An example is provided as Table 1.

TABLE 1
SAMPLING LOCATIONS AND RATIONALE
SITE DESIGNATION
CITY

SAMPLING LOCATION	SAMPLE DEPTH	SAMPLE DESIGNATION	RATIONALE	ANALYSES	COMMENTS
Sampling location should be designated by a unique identifier and should correlate to sampling locations shown on figures.	Depth below ground surface, in feet or inches.	Sample designation should be a unique identifier. This designation should correlate to sample results shown on figures.	Rationale for sampling location (relative to a recognized environmental condition) and depth (based on release or fate and transport mechanism).	Analyses should correlate to the rationale.	Sample preservation, hold, discrete, composite, etc.

APPENDICES

If a Phase I report was not submitted for the site, the appendices should be include information consistent with a Phase I report, including aerial photographs, regulatory database report, previous assessments (may include lead surveys), sanborn maps, site photographs, historical topographical maps, city directories, title search, etc.

APPENDIX A DTSC PHASE I DETERMINATION LETTER

If DTSC provided a determination letter that a PEA is required based on review and approval of a Phase I report, it should be provided here and referenced in the text.

APPENDIX B RESPONSES TO DTSC COMMENTS

A response to DTSC comments should be prepared as a table. The table should restate each comment and provide the associated response. Each response should clearly state the proposed revisions and reference the location in the text that will be revised.

APPENDIX C HEALTH AND SAFETY PLAN

The HASP should generally follow *Draft Site Specific Health and Safety Plan Guidance Document For Site Assessment/Investigation, Site Mitigation Projects, Hazardous Waste Site Work Closure, Post Closure, and Operation and Maintenance Activities* (DTSC 2000). The most recent version of this guidance document should be used and is available on the DTSC web page at www.dtsc.ca.gov [Only include if the HASP Template is posted on the DTSC Web site accessible by the public. The template is currently only available on the DTSC Intranet. Check with Kathleen Yokota-Wahl for status of posting to public web site].

DTSC is not charged with the enforcement of occupational health standards and is not limited by such standards requiring health and safety information. DTSC review is based upon authority provided by the Health and Safety Code, title 22, and the Code of Federal Regulations. The authority to require a HASP be developed, submitted, reviewed and corrected to DTSC standards is found in the following state and federal regulations as well as official DTSC policies and procedures:

- Health and Safety Code, section 25356.1, subdivision (d) - Remedial Action Plans (RAPs) must conform to the provisions of 40 Code of Federal Regulations part 300.400 et seq., with emphasis on 40 Code of Federal Regulations part 300.430, which requires a site specific health and safety plan which, at a minimum, should meet the requirements of the 29 Code of Federal Regulations part 1910.120.
- Health and Safety Code, section 25187.1, subdivision (a) - Grants DTSC the authority to issue orders to ascertain the nature and extent of hazards to human health or the environment.

- Health and Safety Code, section 25358.3, subdivision (b)(1) - Grants DTSC the authority to acquire information necessary to determine the extent of dangers present at a site.
- Health and Safety Code, section 25200.1.5, subdivisions (g)(3)(A) through (g)(3)(E) - Requires site operational conditions which includes physical and chemical hazards, potential accidents and actions taken to prevent them, training levels and contingency planning to be identified.
- Health and Safety Code, section 25356.1, subdivisions (h)(3)(A) through (h)(3)(D) - Allows DTSC to waive the requirements of a RAP if an approved health and safety plan is provided, along with the satisfactory completion of remaining requirements.
- 40 Code of Federal Regulations part 300.430(b)(6) - All remedial investigations require the preparation of a site-specific health and safety plan.
- Health and Safety Code, section 25355.5, subdivision (a)(1)(B) - Grants DTSC the authority to issue an order requiring a RAP be submitted for DTSC approval.
- California Code of Regulations, title 8, section 5192 - Hazardous Waste Operations and Emergency Response: Details specific requirements for development of a HASP.
- 29 Code of Federal Regulations part 1910.120. Requires all hazardous materials workers to be trained and that a HASP and contingency plan be prepared.
- 40 Code of Federal Regulations part 311.1 - Provides all employees on hazardous waste sites are covered by a HASP.
- DTSC Policy and Procedure #86-20 (superceded by EO 93-009)- Remedial Action Orders and "enforceable" agreements: require a health and safety plan be submitted as part of the RI/FS workplan.
- DTSC Policy and Procedure #87-9 Walk-in Business: Work plans developed for walk-in business require site specific HASP be included.
- DTSC EO #93-009 Imminent and/or Substantial Endangerment Orders: requires the preparation of a site-specific HASP prior to the start of work.
- DTSC P/P 87-2 - The RAP process: requires that the health and safety risks at the site be identified.